201-14898

December 11, 2003

Michael O. Leavitt
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., NW
Washington, DC 20460

PETA
PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

HEADQUARTERS
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Re: Comments on the HPV test plan for methyl 4-formylbenzoate

Dear Administrator Leavitt:

The following comments on the test plan for methyl 4-formylbenzoate (CAS no. 001571-08-0), prepared by Eastman Chemical Co. are submitted on behalf of the Physicians' Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the U.S., the Doris Day Animal League, and Earth Island Institute. These health, animal, and environmental protection organizations have a combined membership of more than ten million Americans.

In the test plan and attached summaries, Eastman has presented a great deal of data from previous studies carried out by both itself and other organizations, and on the basis of these data it has appropriately concluded that no additional testing is necessary under the High Production Volume Chemical Challenge. Eastman is to be commended for applying one important but often disregarded principle. This was formulated by the EPA in 1999 in a letter to manufacturers and importers (Wayland, S.H., Oct. 4, http://www.epa.gov/chemrtk/ceoltr2.htm), and then reiterated in the *Federal Register* ("Data collection and development on HPV chemicals", Vol. 65, No. 248, Dec. 26, p. 81691) in 2000:

> "Participants shall maximize the use of scientifically appropriate categories of related chemicals and structure activity relationships."

Eastman's analysis in this respect is particularly sophisticated. In addition to using data from compounds with structures that have close structural relationships with methyl 4-formylbenzoate, such as terephthalic acid and methyl terephtalate, it has used data from two monofunctional analogs, each of which contain only one of the two functional groups of methyl 4-formylbenzoate, enabling discrimination between the possible toxicities of these two groups. The monofunctional analogs used were methyl benzoate and benzaldehyde.

In addition to the above analog-based analysis, Eastman has made full use of ECOSAR, the software that the EPA advocates for the analysis of structure-activity relationships for fish toxicity.

Thank you for your attention to these comments. I can be reached at 757-622-7382, extension 1304, or via e-mail at JessicaS@PETA.org.

Sincerely,

Jessica Sandler
Federal Agency Liaison